

To: Ms. von der Leyen, President of the European Commission
Ms. Ribera, Executive Vice-President for a Clean, Just and Competitive Transition
Ms. Roswall, Commissioner for Environment, Water Resilience and a Competitive Circular Economy
Mr. Dombrovskis, European Commissioner for Economy and Productivity, and Commissioner for Implementation and Simplification

Subject: Strong concerns on increasing pressure to include EU Nature Restoration Regulation in the Commission's Environmental Omnibus

3 December 2025

Dear Ms. von der Leyen, Ms. Ribera, Ms. Roswall and Mr. Dombrovskis,

With this letter, the undersigned NGOs want to express their dismay about the increasing pressure to include the EU Nature Restoration Regulation in the Commission's Environmental Omnibus.

The EU institutions adopted the EU Nature Restoration Regulation in June 2024. Since then, Member States have been developing their draft national nature restoration plans, due to be submitted to the Commission by September 2026. Government authorities across the EU have set up governance structures, stakeholder consultations and expert platforms to facilitate the development of the plans in line with the legal requirements of the Regulation. Arbitrary simplification or even a 'stop-the-clock' for implementation of the Regulation would negate all the efforts done so far, risking a legal vacuum.

Also, the reported concerns around the lack of financing of the Nature Restoration Regulation, should not derail the urgent and much needed preparation for action. National and European decision makers should rather secure the needed investment through national and EU funding.

We would like to remind that Europe continues to face the unprecedented impacts from the intertwined collapse of our climate and ecosystems, including those needed for food production, water resilience, flood and fire prevention, and for securing the health of European citizens. The environmental breakdown is a direct threat to Europe's competitiveness and green transition, especially given that two thirds of the EU Gross Value Added (GVA) is estimated to have a medium to high dependency on nature according to the latest JRC report. Businesses need a stable environment, critical safeguards and sustainability values to thrive.

In light of the International Court of Justice's Advisory Opinion (23 July 2025), States "*have a continuing duty to preserve and improve carbon sinks*". The EU Nature Restoration Regulation gives effect to this, with any weakening of the Regulation or delay in its implementation risking going against the Court's and the IPCC's findings.

The EU Nature Restoration Regulation is a key solution to address the multi-crisis our society faces today. Concerned citizens, civil-society organisations, scientists, progressive farming organisations and businesses have all been outspoken in their unwavering support for this

Regulation. In response to the Commission's call for evidence on simplifying environmental laws in September, 187 621 citizens' messages asked to not dismantle the EU's environmental legislation. This cannot be ignored.

We therefore call upon you to unequivocally reject the erratic calls to include the EU Nature Restoration Regulation in the Environmental Omnibus's scope. Instead, the Commission needs to continue supporting Member States and other stakeholders to implement the Regulation fully. We thus count on the Commission to act as a strong facilitator, upholding its responsibilities and democratic principles.

Yours sincerely,



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Regional Director BirdLife Europe and Central Asia



Anaïs Berthier
Head ClientEarth in Europe



Patrick ten Brink
Secretary General European Environmental Bureau (EEB)



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